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David A. Zwally
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Via Electronic Filing

The Honorable Denis R. Hurley
United States District Judge
United States District Court
for the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Tokyo Electron Arizona, LLC v. Discreet Industries Corp. & Ovadia Meron*
Civ. A. No. 01-3245 (DRH) (WDW)

Dear Judge Hurley:

We represent Tokyo Electron Arizona, LLC ("TAZ") in the above-captioned action. After receiving the Court's May 1, 2007 order regarding the status of funds being held in escrow by Dennis Gleason's firm, Carella, Byrne, Bain, Gilfillan, Cecchi, Stewart & Olstein, P.C. ("Carella Byrne"), counsel for TAZ contacted Discreet and Ovadia Meron's (collectively "Discreet") counsel, in an effort to submit a joint proposal to the Court. The parties have reached an agreement and present it in this joint submission.

Discreet's counsel has agreed to release Carella Byrne as escrow agent. Carella Byrne should deliver the funds being held in escrow to "Tokyo Electron Limited," TAZ's parent company, within one week after Court approval of this joint submission or as otherwise directed by the Court. Carella Byrne can satisfy delivery by sending the money to FLH. The parties have further agreed that the amount being paid to TAZ will act as partial satisfaction of the outstanding judgment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David A. Zwally".

David A. Zwally

cc: Dennis Gleason, Esq.
Oleg Rivkin, Esq.